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28 RASIER, LLC; and RASIER-CA, LLC

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF MICHAEL B.
SHORTNACY IN SUPPORT OF
DEFENDANTS' MOTION TO DISMISS
CASES FOR FAILURE TO COMPLY WITH
COURT ORDER**

This Document Relates to:
K.C. (4) v. Uber Technologies, Inc., et al.,
No. 3:25-cv-05720-CRB

Date: November 7, 2025
Time: 10:00 a.m.
Courtroom: 6 – 17th Floor

1 *Jane Doe LS 615 v. Uber Technologies,*
2 *Inc., et al., No. 3:25-cv-05887-CRB*

3 *Jane Roe CL 183 v. Uber Technologies,*
4 *Inc., et al., No. 3:25-cv-05733-CRB*

5 *Jane Roe CL 184 v. Uber Technologies,*
6 *Inc., et al., No. 3:25-cv-05855-CRB*

7 *Jane Roe CL 185 v. Uber Technologies,*
8 *Inc., et al., No. 3:25-cv-05890-CRB*

9 *Jane Roe CL 186 v. Uber Technologies,*
10 *Inc., et al., No. 3:25-cv-06086-CRB*

11 *R.J. 1472 v. Uber Technologies, Inc., et al.,*
12 *No. 3:25-cv-05991-CRB*

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DECLARATION OF MICHAEL B. SHORTNACY

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3 I, Michael B. Shortnacy, declare pursuant to 28 U.S.C. § 1746:

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5 1. I am over the age of 18 and am a resident of Los Angeles, California. I respectfully
 6 submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-
 7 CA, LLC’s (collectively, “Uber’s”) motion to dismiss the cases of certain Plaintiffs represented by
 8 Levin Simes, LLP, Cutter Law PC, Cohen Hirsch, LP, and Wagstaff Law Firm for noncompliance
 with this Court’s order.

9 2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Uber in
 10 this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare*
 11 *Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the
 12 State of California, the Bar of the State of New York, and the Bar of the District of Columbia. I make
 13 this declaration based upon matters within my own personal knowledge. If called as a witness, I could
 14 and would competently testify to the matters set forth herein.

15 3. On March 19, 2024, this Court entered Pretrial Order No. 10 (“PTO 10”) in this matter,
 16 requiring each Plaintiff to “submit a completed PFS, and executed Authorizations, through MDL
 17 Centrality.” ECF No. 348 at 4. PTO 10 required each Plaintiff whose case was a part of the MDL by
 18 March 26, 2024 to submit a PFS within 60 days of that date—i.e., by May 25, 2024. *Id.* at 5. Each
 19 Plaintiff who joined the MDL after March 26, 2024 must submit a PFS within 30 days of joining. *Id.*
 20 at 6.

21 4. Attached to this declaration as **Exhibit A** is a table identifying seven Plaintiffs who, as
 22 of the date of this Declaration, have failed to submit a Plaintiff Fact Sheet (“PFS”) by their deadline
 23 to do so. The Plaintiffs’ deadlines are identified in the table at Exhibit A.

24 I declare under penalty of perjury under the laws of the State of California that the foregoing
 25 is true and correct.

26 Executed on September 26, 2025 in Los Angeles, California.

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SHOOK, HARDY & BACON L.L.P.

/s/ Michael B. Shortnacy

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